

REMARKS

Claims 37-44 stand rejected as being anticipated by *Montrym* (US Application No. 2003/0103054). Applicants respectfully request reconsideration of the rejections against claims 37-44 based on the following remarks.

Independent claim 37 recites the following elements:

associating an identifier defined by an application-programmable vertex processing system with a parameter defined according to conventional vertex processing;

calling the identifier defined by the application-programmable vertex processing system;

determining which parameter defined according to conventional vertex processing is associated with the called identifier; and

retrieving the parameter determined to be associated with the called identifier.

Montrym (US Application No. 2003/0103054) does not teach or suggest the combination of these elements. *Montrym* instead discloses that “the slots of memory 2550 and the buffers of the first and second set are each assigned a unique identifier upon initially receiving vertex data.”

Montrym, para. 0273. And according to the office action, this material “allows for associating an identifier defined by a programmed [sic].” December 11, 2003 Office Action, page 3.

Assuming that this statement from the office action is correct, it is still insufficient to anticipate claim 37. For example, claim 37 recites an “identifier defined by an application-programmable vertex processing system” and a “parameter defined according to conventional vertex processing.” *Montrym* does not disclose both of these elements. At best, *Montrym* only teaches the use of an identifier defined by a program. It does not teach associating that an identifier . . . with a parameter defined according to conventional vertex processing, as claimed.” Thus, *Montrym* cannot anticipate claim 37.

Claim 37 is allowable over *Montrym* for other reasons. For example, claim 37 recites:
calling the identifier defined by the application-programmable vertex processing system;
determining which parameter defined according to conventional vertex processing is associated with the called identifier;

Montrym does not disclose these limitations and the office action does not point to the claimed “identifier defined by the application-programmable vertex processing system” and the “parameter defined according to conventional vertex.” Accordingly, applicants again submit that *Montrym* does not anticipate claim 37.

Claims 38-41 are dependent on claim 37 and are allowable at least because they incorporate the allowable subject matter of claim 37. Applicants also submit that claims 42, 43 and 44 are allowable for at least reasons similar to those described with respect to claim 37.

Regarding Figure 1, Applicants again submit that this figure is not prior art. Although the design of Figure 1 may incorporate some existing elements, the design is configured to operate in a novel and nonobvious way. Applicants indicated this by stating in their specification that “Figure 1 is a diagram illustrating the various components of one embodiment of the present invention.” page 7, line 7-8. Accordingly, Applicants submit that Figure 1 should not be labeled as “prior art.” However, if the Examiner believes that it should be labeled as “prior art,” applicants will do so with the understanding that the operation of the system is novel and nonobvious and the construction of the system to implement that operation is novel and nonobvious.

CONCLUSION

In view of the foregoing, Applicants respectfully request consideration of the new claims. The Examiner is requested to call Applicants' representative if any question or comments arise.

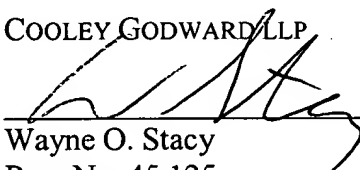
The Commissioner is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 03-3117.

COOLEY GODWARD LLP
Attention: Patent Group
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Tel: (720) 566-4125
Fax: (720) 566-4099

Respectfully submitted,

COOLEY GODWARD LLP

By:


Wayne O. Stacy
Reg. No. 45,125